

UNITED STATES DISTRICT COURT

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for the

US District of Alaska

Division

NOV 09 2021

CLERK, U.S. DISTRICT COURT  
ANCHORAGE, AK

JACQUELINE RENEE VAUGHN

Case No.

3:21-cv-00250-TMB

(to be filled in by the Clerk's Office)

*Plaintiff(s)*

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

FRANK KENDELL,  
Secretary,  
Department of the Air Force,  
Agency

*Defendant(s)*

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one)  Yes  No

**COMPLAINT FOR VIOLATION OF CIVIL RIGHTS**  
(Non-Prisoner Complaint)

**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

## I. The Parties to This Complaint

### A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Jacqueline Renee Vaughn		
Address	102 Huntsmen Lane		
	Harvest	AL	35749
County	<i>City</i>	<i>State</i>	<i>Zip Code</i>
Telephone Number	United States		
E-Mail Address	907-351-6116		
	jackierv01@gmail.com		

### B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

#### Defendant No. 1

Name	Frank Kendall, III		
Job or Title ( <i>if known</i> )	Secretary of The Department of The Air Force		
Address	1500 PERIMETER Rd, Ste 1370		
	Joint Base Andrews	MD	20762
County	<i>City</i>	<i>State</i>	<i>Zip Code</i>
Telephone Number	United States		
E-Mail Address ( <i>if known</i> )	nathaniel.g.himert.mil@mail.mil (Agency Counsel)		

Individual capacity  Official capacity

#### Defendant No. 2

Name			
Job or Title ( <i>if known</i> )			
Address			
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address ( <i>if known</i> )			

Individual capacity  Official capacity

Defendant No. 3

Name \_\_\_\_\_

Job or Title (*if known*) \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip Code \_\_\_\_\_

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address (*if known*) \_\_\_\_\_

Individual capacity  Official capacity

Defendant No. 4

Name \_\_\_\_\_

Job or Title (*if known*) \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip Code \_\_\_\_\_

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address (*if known*) \_\_\_\_\_

Individual capacity  Official capacity

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

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C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

The constitutional right(s) that was violated by the federal officials is the 14th Amendment.

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D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

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### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?  
Civilian Personnel Office  
8517 20th Street, Suite 200  
Joint Base Richardson-Elmendorf Anchorage Alaska, 99506

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B. What date and approximate time did the events giving rise to your claim(s) occur?  
Various dates from approximate March 2016 to May 2017

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C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)  
I was treated differently than my Caucasian co-workers Kathy and Matthew. From March 2016 thru May 2017, I was subjected to on going harrassment, discrimination, denied training, leave and retaliated against for EEO activity by Ms. Tammy Schuyler my supervisor and Laura Hanks the Civilian Personnel Officer.

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The constitutional right(s) that was violated by the federal officials is the 14th Amendment.

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## VI. Certification and Closing

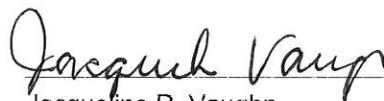
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/02/2021

Signature of Plaintiff



Printed Name of Plaintiff

Jacqueline R. Vaughn

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

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Printed Name of Attorney

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Bar Number

---

Name of Law Firm

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Address

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City

State

Zip Code

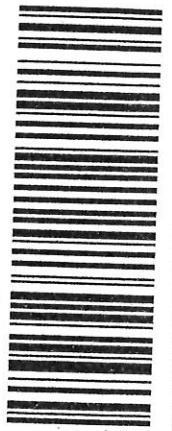
Telephone Number

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E-mail Address

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UNIVERSAL MAIL  
102 HUNTSBON LINE  
4th West AC 35748



2020 2450 0001 2440 2344

UNITED STATES  
POSTAL SERVICE

1023

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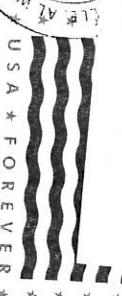
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AMOUNT  
**\$3.95**  
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Lv 9 nov 21

US District Court Alaska  
222 West 7th Ave #4  
Anchorage AC 99513-7544